

**Exhibit 6C**

**July 14, 2014 G. Malhotra Deposition Transcript**

<p style="text-align: right;">Page 1</p> <p>1</p> <p>2 UNITED STATES BANKRUPTCY COURT</p> <p>3 FOR THE EASTERN DISTRICT OF MICHIGAN</p> <p>4 - - -</p> <p>5 In Re: ) Chapter 9</p> <p>6</p> <p>7 City of Detroit, Michigan, )</p> <p>8</p> <p>9 Debtor. ) Hon. Steven Rhodes</p> <p>10 _____</p> <p>11</p> <p>12</p> <p>13</p> <p>14 The videotaped deposition of GAURAV MALHOTRA</p> <p>15 Taken at 51 Louisiana Avenue, N.E.</p> <p>16 Washington, D.C.</p> <p>17 Commencing at 9:09 a.m.</p> <p>18 Tuesday, July 15, 2014</p> <p>19 Before: Gail L. Inghram Verbano</p> <p>20 Registered Diplomat Reporter,</p> <p>21 Certified Realtime Reporter,</p> <p>22 Certified Shorthand Reporter-CA (No. 8635)</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 HEATHER J. HUBBARD, ESQ.</p> <p>3 WALLER LANSDEN DORTCH &amp; DAVIS, LLP</p> <p>4 511 Union Street, Suite 2700</p> <p>5 Nashville, Tennessee 37219</p> <p>6 Appearing on behalf of U.S. Bank.</p> <p>7</p> <p>8</p> <p>9</p> <p>10 SAM J. ALBERTS, ESQ.</p> <p>11 DENTONS US, LLP</p> <p>12 1301 K Street, N.W.</p> <p>13 Suite 600, East Tower</p> <p>14 Washington, D.C. 20005</p> <p>15 Appearing on behalf of the Retiree Committee.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 DOUGLAS G. SMITH, P.C.</p> <p>20 KIRKLAND &amp; ELLIS, LLP</p> <p>21 300 North LaSalle</p> <p>22 Chicago, Illinois 60654</p> <p>23 Appearing on behalf of Syncora Guarantee, Inc.,</p> <p>24 and Syncora Capital Assurance, Inc..</p> <p>25</p>
<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 APPEARANCES:</p> <p>3</p> <p>4 RONALD A. KING, ESQ.</p> <p>5 FRANK J. GUADAGNINO, ESQ. (Pittsburgh Office)</p> <p>6 CLARK HILL, PLC</p> <p>7 212 East Grand River Avenue</p> <p>8 Lansing, Michigan 48906</p> <p>9 Appearing on behalf of the Retirement Systems</p> <p>10 for the City of Detroit.</p> <p>11</p> <p>12</p> <p>13</p> <p>14 GEOFFREY S. STEWART, ESQ.,</p> <p>15 CHRISTOPHER DiPOMPEO, ESQ.,</p> <p>16 SARAH A. HUNGER, ESQ.</p> <p>17 JONES DAY</p> <p>18 51 Louisiana Avenue, N.W.</p> <p>19 Washington, D.C. 20001</p> <p>20 Appearing on behalf of the Debtor and the Witness.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1</p> <p>2 KELLY DiBLASI, ESQ.</p> <p>3 WEIL, GOTSHAL &amp; MANGES, LLP</p> <p>4 767 Fifth Avenue</p> <p>5 New York City, New York 10153</p> <p>6 Appearing on behalf of Financial Guaranty</p> <p>7 Insurance Company.</p> <p>8</p> <p>9</p> <p>10</p> <p>11 MICHAEL BHARGAVA, ESQ.</p> <p>12 CHADBOURNE &amp; PARKE, LLP</p> <p>13 1200 New Hampshire Avenue, NW</p> <p>14 Washington, D.C. 20036</p> <p>15 Appearing on behalf of Creditor Assured</p> <p>16 Guaranty.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Pages 1 to 4

<p style="text-align: right;">Page 209</p> <p>1 MALHOTRA</p> <p>2 <b>A. I would have to go back and look. But</b></p> <p>3 <b>on the commercial and industrial, on the corporate</b></p> <p>4 <b>side it would be a high number. But I do not know</b></p> <p>5 <b>specifically of the exact percentage collection.</b></p> <p>6 Q. You don't know what the percent</p> <p>7 collection is for the individual income tax;</p> <p>8 correct?</p> <p>9 <b>A. Well, even the individual income tax has</b></p> <p>10 <b>different components between residents working in</b></p> <p>11 <b>the city, residents working out of the city and</b></p> <p>12 <b>nonresidents. And I do not know off the top of my</b></p> <p>13 <b>head what the collection rate is for each one of</b></p> <p>14 <b>those components.</b></p> <p>15 Q. Do you know how many companies actually</p> <p>16 pay the corporate tax?</p> <p>17 <b>A. I do not. It's -- I do not.</b></p> <p>18 Q. Do you know if there are -- do you have</p> <p>19 any information about exceptions or reductions in</p> <p>20 taxes available to corporations or other entities</p> <p>21 within the City?</p> <p>22 <b>A. There is the -- the renaissance zone,</b></p> <p>23 <b>but that's probably more in relation to property</b></p> <p>24 <b>taxes. In terms of corporate income taxes, I'm</b></p> <p>25 <b>not aware of any specific incentives that would be</b></p>	<p style="text-align: right;">Page 211</p> <p>1 MALHOTRA</p> <p>2 the City will also have billions of dollars in</p> <p>3 expenditures; correct?</p> <p>4 <b>A. That would be consistent with what the</b></p> <p>5 <b>forecasts are, yes.</b></p> <p>6 Q. Do you have any understanding about what</p> <p>7 the amount in terms of dollars is of the reduction</p> <p>8 in the COPs claim under the plan?</p> <p>9 MR. STEWART: Objection -- pardon me.</p> <p>10 Objection.</p> <p>11 THE WITNESS: Well, as a part of the</p> <p>12 plan, the COPs claim is -- the claim is</p> <p>13 roughly a billion four forty, and the</p> <p>14 estimated recovery based on the assumptions</p> <p>15 in the plan are roughly 10 percent.</p> <p>16 BY MR. SMITH:</p> <p>17 Q. What are the most -- what are the key</p> <p>18 assumptions of your forecast being modeled?</p> <p>19 <b>A. They are -- they're -- we can walk</b></p> <p>20 <b>through each one of the line items in the key</b></p> <p>21 <b>assumptions there.</b></p> <p>22 Q. Well, how about I ask you this: Are the</p> <p>23 key assumptions of your forecasting model</p> <p>24 reflected in your expert report?</p> <p>25 And I'll hand you a copy of it in a</p>
<p style="text-align: right;">Page 210</p> <p>1 MALHOTRA</p> <p>2 <b>provided by the City.</b></p> <p>3 Q. What is the treatment of property taxes</p> <p>4 within the renaissance zone?</p> <p>5 <b>A. I believe that it is more in the context</b></p> <p>6 <b>of properties that are in the renaissance zone</b></p> <p>7 <b>will have a slightly different taxable value that</b></p> <p>8 <b>is associated with it versus the properties that</b></p> <p>9 <b>are not in the renaissance zone. And that,</b></p> <p>10 <b>however, the properties in the renaissance zone</b></p> <p>11 <b>make up a small component of the overall total</b></p> <p>12 <b>properties and the total property taxes, but I</b></p> <p>13 <b>would have to look through the details to kind of</b></p> <p>14 <b>explain the exact structure.</b></p> <p>15 Q. The property tax in the renaissance</p> <p>16 zone, is it lower?</p> <p>17 <b>A. Well, I don't know if it's the rate or</b></p> <p>18 <b>the assessed values. I would have to go back and</b></p> <p>19 <b>check how the mix is built up.</b></p> <p>20 Q. Do you agree that under your forecast,</p> <p>21 over the course of the next 10 years, the City</p> <p>22 will bring in billions of dollars of revenue?</p> <p>23 <b>A. Over the next ten years, the City's</b></p> <p>24 <b>projections are about \$11 billion in revenue.</b></p> <p>25 Q. Over the course of the next ten years,</p>	<p style="text-align: right;">Page 212</p> <p>1 MALHOTRA</p> <p>2 second, which I will mark as Exhibit 3.</p> <p>3 (Exhibit Malhotra-3 was marked for</p> <p>4 identification.)</p> <p>5 THE WITNESS: Could you please repeat</p> <p>6 the question.</p> <p>7 BY MR. SMITH:</p> <p>8 Q. I could just ask the question again.</p> <p>9 Are the key assumptions in your model</p> <p>10 reflected in your expert report, or are there some</p> <p>11 key assumptions that are not in the report?</p> <p>12 <b>A. If I may, I would say the majority of</b></p> <p>13 <b>the assumptions are in the expert report or have</b></p> <p>14 <b>been mentioned in the assumptions of the model</b></p> <p>15 <b>that are exhibits or -- to the expert report.</b></p> <p>16 <b>So . . .</b></p> <p>17 Q. Does your expert report contain a</p> <p>18 complete and accurate account of your expert</p> <p>19 opinions in this case?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Do you anticipate doing any further work</p> <p>22 before the confirmation hearing?</p> <p>23 <b>A. Further work on what?</b></p> <p>24 Q. On the forecasts or developing any other</p> <p>25 opinions?</p>

<p style="text-align: right;">Page 213</p> <p>1 MALHOTRA</p> <p>2 <b>A. If we reach more settlements, we will</b></p> <p>3 <b>update the forecast as those settlements come</b></p> <p>4 <b>along.</b></p> <p>5 Q. What settlements are in process that</p> <p>6 you're talking about?</p> <p>7 MR. STEWART: Before you answer,</p> <p>8 Mr. Malhotra, I just simply caution you to</p> <p>9 remember that you're not permitted by the</p> <p>10 judge's order to disclose anything that's</p> <p>11 been going on in mediations. Subject to</p> <p>12 that, please answer the question.</p> <p>13 THE WITNESS: All right. Thank you.</p> <p>14 We're working on the Detroit Police</p> <p>15 Officers Association and with the Detroit</p> <p>16 Fire Fighters Association to hopefully wrap</p> <p>17 up those negotiations.</p> <p>18 BY MR. SMITH:</p> <p>19 Q. And what are specifically the issues</p> <p>20 that you're trying to wrap up there?</p> <p>21 <b>A. That's --</b></p> <p>22 MR. STEWART: Once again, please answer</p> <p>23 with that same admonition about mediation.</p> <p>24 THE WITNESS: That's subject to</p> <p>25 mediation.</p>	<p style="text-align: right;">Page 215</p> <p>1 MALHOTRA</p> <p>2 you say that your projected revenues and</p> <p>3 expenditures are reasonable forecasts.</p> <p>4 Do you see that?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. You'd acknowledge that other independent</p> <p>7 experts could come up with reasonable forecasts</p> <p>8 that differ from your forecast; correct?</p> <p>9 <b>A. I don't know what other experts would</b></p> <p>10 <b>come up with. It's up to them.</b></p> <p>11 Q. I know. But my only question is, there</p> <p>12 could be reasonable forecasts of the general</p> <p>13 fund's revenues and expenditures that are</p> <p>14 different from the forecasts you put together;</p> <p>15 correct?</p> <p>16 <b>A. I don't know about that. I feel that</b></p> <p>17 <b>these are reasonable forecasts, and I can't talk</b></p> <p>18 <b>to what other forecasts would be reasonable or not</b></p> <p>19 <b>reasonable that are not generally the forecasts</b></p> <p>20 <b>that I have in front of me.</b></p> <p>21 Q. You're not taking the position that your</p> <p>22 forecasts are the only reasonable forecasts of</p> <p>23 general fund revenues and expenditures that could</p> <p>24 be made; correct?</p> <p>25 <b>A. I am taking the position that based on</b></p>
<p style="text-align: right;">Page 214</p> <p>1 MALHOTRA</p> <p>2 BY MR. SMITH:</p> <p>3 Q. Okay. Is there anything that's not</p> <p>4 subject to mediation that you could talk about</p> <p>5 relating to settlements in the works or not? Or</p> <p>6 is it all part of mediations?</p> <p>7 <b>A. It's generally the discussions are part</b></p> <p>8 <b>of mediations.</b></p> <p>9 Q. Okay. In your expert report you</p> <p>10 mention -- on Page 1 you say you've forecasted</p> <p>11 revenues and expenses for the City's general fund;</p> <p>12 correct?</p> <p>13 <b>A. That is correct.</b></p> <p>14 Q. You haven't attempted to forecast</p> <p>15 revenues and expenses for the entire city;</p> <p>16 correct?</p> <p>17 <b>A. That is correct.</b></p> <p>18 Q. And if you look at -- why did you</p> <p>19 perform a 40-year forecast?</p> <p>20 <b>A. It was to get a longer-term view of the</b></p> <p>21 <b>liabilities that the City was signing up for in</b></p> <p>22 <b>terms of the various settlements to ascertain and</b></p> <p>23 <b>understand the City's ability to meet the</b></p> <p>24 <b>obligations that it was signing up to.</b></p> <p>25 Q. On Page 2 of your report in the middle,</p>	<p style="text-align: right;">Page 216</p> <p>1 MALHOTRA</p> <p>2 <b>the assumptions we have in here, these are the</b></p> <p>3 <b>forecasts that I -- I seem or deem are reasonable.</b></p> <p>4 <b>So I can't talk to what other forecasts may or may</b></p> <p>5 <b>not be reasonable unless I understand assumptions</b></p> <p>6 <b>and so on and so forth.</b></p> <p>7 Q. My only question is, is your forecast</p> <p>8 the only reasonable forecast that's possible of</p> <p>9 the general fund revenues and expenditures?</p> <p>10 <b>A. I don't know. I can talk to these</b></p> <p>11 <b>forecasts being reasonable. I don't know whether</b></p> <p>12 <b>other forecasts are reasonable or not.</b></p> <p>13 Q. Over on Page 4 of your report, you</p> <p>14 identify some of the experts that you're relying</p> <p>15 on; correct? Such as Mr. Cline and Ms. Sallee.</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. Page 7 of your report at the bottom of</p> <p>18 the page, you talk about the assumptions, some of</p> <p>19 the assumptions that you made. Do you see that?</p> <p>20 There's a section called "Assumptions."</p> <p>21 <b>A. That's correct.</b></p> <p>22 Q. And it would be fair to say that your</p> <p>23 forecasts are based on a series of assumptions;</p> <p>24 correct?</p> <p>25 <b>A. Yes.</b></p>

Pages 213 to 216